

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)

STEVEN KNURR, Individually and on)	
Behalf of All Others Similarly Situated,)	
)	
Plaintiff,)	
)	Civil Action No. 1:16-cv-01031-TSE-MSN
vs.)	
)	
ORBITAL ATK, INC., et al.,)	
)	
Defendants.)	
_____)	

**PLAINTIFFS' MOTION TO COMPEL DEFENDANTS' COMPLIANCE WITH THE
COURT'S MAY 4, 2018 ORDER AND PRODUCTION OF ALL PURPORTEDLY
PRIVILEGED DOCUMENTS**

Pursuant to Rules 26, 34, and 37 of the Federal Rules of Civil Procedure and Local Civil Rule 37(A) and (D), Lead Plaintiff Construction Laborers Pension Trust of Greater St. Louis and Named Plaintiff Wayne County Employees' Retirement System ("Plaintiffs") move to compel Defendants to comply with Judge Nachmanoff's May 4, 2018 order [ECF No. 165] and to produce all purportedly privileged documents, including those related to the Internal Investigation. The grounds for this Motion are set forth in the accompanying Memorandum of Law. The undersigned certifies that a good faith effort was made to narrow or resolve the issues set forth in this Motion in accordance with Local Civil Rules 7(E) and 37(E).

Respectfully submitted, this 15th day of June 2018.

/s/ Craig C. Reilly
Craig C. Reilly (VSB # 20942)
111 Oronoco Street
Alexandria, Virginia 22314
T: 703/549-5354
F: 703/549-5355
E: craig.reilly@ccreillylaw.com
Liaison Counsel for Lead Plaintiff

ROBBINS GELLER RUDMAN
& DOWD LLP
SAMUEL H. RUDMAN
58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)

ROBBINS GELLER RUDMAN
& DOWD LLP
JAMES E. BARZ
FRANK RICHTER
200 South Wacker Drive, 31st Floor
Chicago, IL 60606
Telephone: 312/674-4674
312/674-4676 (fax)

ROBBINS GELLER RUDMAN
& DOWD LLP
MAUREEN E. MUELLER
KATHLEEN B. DOUGLAS
120 East Palmetto Park Road, Suite 500
Boca Raton, FL 33432
Telephone: 561/750-3000
561/750-3364 (fax)

ROBBINS GELLER RUDMAN
& DOWD LLP
JOHN C. HERMAN
PETER M. JONES
Monarch Tower, Suite 1650
3424 Peachtree Road, N.E.
Atlanta, GA 30326
Telephone: 404/504-6500
404/504-6501 (fax)
Lead Counsel for Plaintiff

VANOVERBEKE MICHAUD &
TIMMONY, P.C.
THOMAS C. MICHAUD
79 Alfred Street
Detroit, MI 48201
Telephone: 313/578-1200
313/578-1201 (fax)
*Additional Counsel for Plaintiff Wayne County
Employees' Retirement System*

CERTIFICATE OF SERVICE

I hereby certify that on June 15, 2018, I filed the foregoing pleading or paper through the Court's CM/ECF system, which sent a notice of electronic filing to all registered users.

/s/ Craig C. Reilly
Craig C. Reilly (VSB # 20942)
111 Oronoco Street
Alexandria, Virginia 22314
T: 703/549-5354
F: 703/549-5355
E: craig.reilly@ccreillylaw.com
Liaison Counsel for Lead Plaintiff